

**DRAFT****REMARKS**

Claims 1-27 are now pending in the application. Claims 1-27 stand rejected. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

**SPECIFICATION**

The specification stands objected to for certain informalities. Applicants have amended the specification according to the Examiner's suggestions. Therefore, reconsideration and withdrawal of this objection are respectfully requested.

**REJECTION UNDER 35 U.S.C. § 112**

Claims 1-27 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Applicants have amended the specification to define the terms of art used in Applicants' specification. As these terms are known in the art, no new matter was added by defining them. Reconsideration and withdrawal of this rejection are respectfully requested.

Claims 1-27 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point and distinctly claim the subject matter which Applicants regard as the invention. Applicants have amended the claims to overcome these informalities. Reconsideration and withdrawal of this rejection are respectfully requested.

**DRAFT****REJECTION UNDER 35 U.S.C. § 103**

Claims 1-23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cahuzac (U.S. Pat. No. 5,914,002). This rejection is respectfully traversed.

At the outset Applicants note claim 1 includes "a first CAD native shape representative of the shape of the tool [and] a second CAD native shape representative of the tool side ply." Claim 13 includes "representing a shape of the tool with a first CAD native shape . . . representing the tool side ply with a second CAD native shape [and] locating the tool side ply adjacent the first CAD native shape." Applicants respectfully submit Cahuzac does not teach or suggest Applicants' invention as claimed.

Cahuzac appears to disclose software which merely takes a shape of a component which was previously described through other software and converts that shape into mathematical X, Y and Z coordinates. Then, the program drives a needle to a stitch in a pattern described by the X, Y and Z coordinates. (See at least column 4, lines 39 through 48). Cahuzac does not teach or suggest using native CAD geometry whatsoever, as native CAD geometry includes surfaces, shell or shell solids which are not disclosed in Cahuzac. Rather, Cahuzac discloses transferring a component into X, Y and Z coordinates for positioning a needle to lay thread. Applicants respectfully submit a line is not native CAD geometry.

Accordingly, Applicants respectfully assert that as Cahuzac fails to teach or suggest the use of native CAD shapes, claims 1 and 13 are patentable and in condition for allowance. In addition, as claims 2-12 and 14-23 depend from either independent claim 1 or 13, these claims are also believed to be patentable and in condition for

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allowance. Reconsideration and withdrawal of these rejections are respectfully requested.

Claims 24-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cahuzac in view of Matheson (U.S. Pat. No. 6,718,218). This rejection is respectfully traversed.

Applicants note claim 24 includes "accessing a file including a three dimensional CAD model of the composite part, the model including a first CAD native shape representative of the ply . . . ." and claim 26 includes "creating a file including a three dimensional CAD model of the composite part, the model including a first CAD native shape representative of the ply . . . ." Applicants respectfully submit the combination of Cahuzac and Matheson does not teach or suggest Applicants' invention as claimed.

As discussed previously, Cahuzac does not teach or suggest whatsoever the use of CAD native shapes. Similarly, Matheson does not teach or suggest a model including a first CAD native shape either. At best, Matheson appears to disclose accessing a file including data regarding a three dimensional CAD model but does not disclose whatsoever accessing a file which includes a three dimensional CAD model defined through a first CAD native shape. Rather, Matheson appears to disclose only viewing the data associated with the part itself and not the actual part in three dimensional form (See at least column 4, lines 63-67).

As Matheson does not teach or suggest the use of viewing a model including a first CAD native shape, Applicants respectfully submit that the combination of Cahuzac and Matheson does not teach or disclose whatsoever Applicants' invention as claimed. Accordingly, Applicants believe independent claims 24 and 26 are patentable and in

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condition for allowance. In addition, as claims 25 and 27 depend from either independent claim 24 or 26, Applicants also believe these claims are patentable and in condition for allowance. Reconsideration and withdrawal of these rejections are respectfully requested.

**CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: \_\_\_\_\_

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